

## REMARKS

Reconsideration of the present application is respectfully requested. Claims 11, 27 and 39 have been amended. The amendment places claims 11, 27 and 39 in better form for allowance. No claims have been canceled in this response (claims 1-10 were previously canceled). Claims 70 and 71 have been newly added in this response. No new matter has been added.

### Claim Rejections §103

Independent claims 11, 27, 39, 42, 49 and 58 stand rejected under 35 U.S.C. §103(a) based on Geiger et al. (U.S. Patent no. 6,463,534) in view of Newton (U.S. Pub. No. 2003/0035547). Applicants respectfully traverse the rejections.

Claim 11, as currently amended, recites:

11. A method comprising:  
obtaining a first domain name provided by a client;  
retrieving a second domain name from a digital certificate;  
comparing the first domain name and the second domain name; and  
**if the first domain name and the second domain name do not match,  
accessing a data structure to determine whether the first domain name is mapped to  
the second domain name.**  
(Emphasis added).

The Examiner acknowledged that Geiger does not teach or suggest the above emphasized limitation, namely, if the first domain name and the second domain name do not match, accessing a data structure to determine whether the first domain name is mapped to the second domain name, but alleged that Newton's paragraphs 113-114 and 127-128 teach or suggest the limitation. Applicants have analyzed the cited paragraphs, but find no discussion, or even a hint, regarding the above emphasized limitation in claim 11.

Specifically, Newton's paragraph 114 discloses a method which protects against a Man-in-the-Middle attack. According to the method, if the domain name in the server's certificate does not match the domain name of the server, clients must refuse to authenticate the server. Thus, the method does not teach or suggest: if the first domain name and the second domain name do not match, accessing a data structure to determine whether the first domain name is mapped to the second domain name, for example, accessing a mapping table to determine whether the domain name in the server's certificate is mapped to the domain name of the server.

Newton's paragraphs 127-128 concern the concepts of "certificate", "digital signature", "public key", etc. Paragraphs 127-128 contain no discussion regarding the above emphasized limitation of claim 11, namely, if the first domain name and the second domain name do not match, accessing a data structure to determine whether the first domain name is mapped to the second domain name.

On page 15 of the final office action mailed on 10/19/2006, the Examiner asserts that Applicants just provided a "general allegation that the claims define a patentable invention without specifically pointing out how the language of the claims patentably distinguishes them from the references". Further, the Examiner alleges that "Applicants' assertions are just mere allegation with no supported fact." Applicants respectfully disagree.

The above reasons presented are not mere allegations. They are concrete reasons why the claims are patentable over the cited art. The specific argument that the prior art does not teach or suggest the claim limitation of accessing a data structure to determine whether the first domain name is mapped to the second domain name if the first domain name and the second domain name do not match is not a mere "general allegation". The fact that the cited sections and the rest of Newton do not teach or suggest the discussed limitation is the supporting fact that the

present claims are patentable over the cited art. In the absence of more specificity by the Examiner to explain the rejections, Applicants fail to see how they could be any more specific.

In an advisory action mailed on 2/5/2007, the Examiner alleges that “the server determines if the two domain certificates match in order to grant authentication of the client to domain.” The Examiner further alleges that “by giving the broadest interpretation of the Applicants’ claim language, Newton does disclose accessing a data structure to determine whether the first domain is mapped to the second domain if the first domain name and the second domain name do not match.” Thus, the Examiner is essentially alleging that if two domain names are mapped to each other, they are considered as matching to each other. However, the Examiner’s interpretation is completely unsupported by the plain meaning of Applicants’ claim language, neither is the Examiner’s interpretation supported by the specification of Applicants’ application. As the above emphasized limitation of claim 11 recites, if a first domain name does not match a second domain name, the method determines, by accessing a data structure, whether the first domain name is mapped to the second domain name. Thus, from the plain meaning of the claim language, “matching” is different from “mapped”. Otherwise, according to the Examiner’s interpretation, two domain names which do not match to each other would never be mapped to each other, therefore, there is no need to determine whether the first domain name is mapped to the second domain name.

Thus, at least for the foregoing reasons, Newton does not teach the limitation of if the first domain name and the second domain name do not match, accessing a data structure to determine whether the first domain name is mapped to the second domain name. Neither does Geiger disclose or suggest this limitation. Therefore, Geiger and Newton, individually or in

combination, do not teach or suggest all limitations of claim 11. Therefore, claim 11 and all claims which depend on it are patentable over Geiger and Newton.

The other independent claims contain limitation similar to that discussed for claim 11 above. For similar reasons, therefore, all of the other independent claims and the claims which depend on them are also patentable over Geiger and Newton.

In addition, independent claims 39 and 42 each recites using a proxy gateway to compare whether the first domain name matches the second domain name and whether the first domain name is mapped to the second domain name if they do not match. In contrast, Newton does not teach or suggest a proxy gateway, such as recited in claims 39 and 42. The method disclosed in Newton, however, occurs at a client machine. For example, Newton's paragraphs 111-114 discuss a client authenticating a server's identity. None of the steps of the authentication occurs at a proxy gateway. Neither does Geiger teach or suggest such a proxy gateway. Thus, at least for the above additional reason, claims 39 and 42 are patentable over Geiger and Newton.

#### Dependent Claims


In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If any additional fee is required, please charge Deposit Account No. 02-2666.

Respectfully submitted,  
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